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PROPERTY OWNERS ASSOCIATION

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ADRIAN RISKIN,

Petitioner,

vs.

DOWNTOWN LOS ANGELES PROPERTY
OWNERS ASSOCIATION,

Respondent.

Case No. BS174792

**DOWNTOWN LOS ANGELES
PROPERTY OWNERS ASSOCIATION'S
OBJECTIONS TO PETITIONER'S
DECLARATIONS, EXHIBITS AND
"VERIFIED" PETITION, IN SUPPORT
OF OPPOSITION TO PETITION FOR
WRIT OF MANDATE**

**[COMPENDIUM OF DECLARATIONS
AND EXHIBITS; OPPOSITION TO
PETITION FOR WRIT OF MANDATE;
FILED CONCURRENTLY HERewith]**

**Date: June 26, 2019
Time: 9:30 a.m.
Courtroom: Dept. 86**

*(Assigned to the Hon. Mitchell L. Beckloff,
Department 86)*

Complaint Filed: 08/15/2018

OBJECTIONS TO RISKIN DECLARATION

Objection Number 1

“One record responsive to Request #1 is a February 2016 email exchange between Respondent’s Executive Director Rena Leddy (rena@fashiondistrict.org) and Jessica Lall at the South Park BID (jessica@southpark.la) regarding sponsorship of an event.” (Riskin Decl., Para. 4, 2:5-7.)

Grounds for Objection Number 1: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Foundation (Evid.C. § 403).

Objection Number 2

“Another record responsive to Request #1 is an August 2016 email from Leddy to a number of individuals of other BIDs, including Jessica Lall at the South Park BID, regarding a LA BID Salary and Benefits survey.” (Riskin Decl., Para. 5, 2:11-13.)

Grounds for Number Objection 2: Lack of personal knowledge (Evid.C. § 702(a)); lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Foundation (Evid.C. § 403).

Objection Number 3

“Another record responsive to Request #1 is a June 2016 email from Jasmine Ramos, an Administrative Assistant with Respondent (Jasmine @fashiondistrict.org), to a number of individuals at the City of Los Angeles and other BIDs including Lall at the South Park BID, Josh Kreger at the South Park BID (josh@southpark.la), Laura Hill at the South Park BID (laura@southpark.la), and Priscilla Hsu at the South Park BID (pricilla@southpark.la), regarding a meeting of the Los Angeles BID Consortium.” (Riskin Decl., Para. 6, 2:16-21.)

Grounds for Objection Number 3: Lack of personal (Evid.C. § 702(a)); lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Foundation (Evid.C. § 403).

Objection Number 4

“Another record responsive to Request #1 is a February 2017 email from Ramos to a number of individuals at other BIDs including Lall, Kreger, and Katie Kiefer (katie@southpark.la) at the South

1 Park BID, regarding a BID Consortium Happy Hour. (Riskin Decl., Para. 7, 2:24-26.)

2 **Grounds for Objection Number 4:** Lack of personal knowledge (Evid.C. § 702(a)); lack of
3 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
4 Foundation (Evid.C. § 403).

5 Objection Number 5

6 “Records obtained from other BIDs indicate that Ramos sent numerous emails regarding the Los
7 Angeles BID Consortium in 2016 and 2017, including monthly scheduling emails.” (Riskin Decl., Para.
8 8, 3:3-3-6.)

9 **Grounds for Objection Number 5:** Lack of personal knowledge (Evid.C. § 702(a)); lack of
10 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
11 Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

12 Objection Number 6

13 “Many of those emails were sent to her own email address (jasmine@fashiondistrict.org) with
14 the email address of other recipients presumably appearing the “bcc” address line.” (Riskin Decl., Para.
15 8, 5-6.)

16 **Grounds for Objection Number 6:** Lack of personal knowledge (Evid.C. § 702(a)); lack of
17 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
18 Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

19 Objection Number 7

20 “As shown by emails attached in Exhibit A, individuals with the South Park BID received BID
21 Consortium emails from Ramos when email addresses appeared in the “to” line.” (Riskin Decl., Para. 8,
22 3:6-8.)

23 **Grounds for Objection Number 7:** Lack of personal knowledge that email sent by Ms. Ramos
24 (Evid.C. § 702(a)); lack of authenticity that document reflects email sent by Ms. Ramos (Evid.C. §§
25 1400, 1413); Irrelevant as not the subject of the Petition (Evid.C. §§ 350, 352); Hearsay (Evid.C. §
26 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

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Objection Number 8

"If South Park BID members also received emails when recipients' email addresses appeared in the "bcc" line, those emails would be responsive to this request as well." (Riskin Decl., Para. 8, 3:8-10).

Grounds for Objection Number 8: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 9

"The BID Consortium is an association of Los Angeles BIDs through which BIDs share information and work collectively." (Riskin Decl., Para. 9, 3:11-12.)

Grounds for Objection Number 9: Lack of personal knowledge (Evid.C. § 702(a)); Irrelevant (Evid.C. §§ 350, 352); Opinion (Evid.C. §§ 800, 803); Argumentative.

Objection Number 10

"The association is described on the Los Angeles City Clerk's website." (Riskin Decl., Para. 9, 3:12-13.)

Grounds for Objection Number 10: Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Irrelevant (Evid.C. §§ 350, 352); Foundation (Evid.C. § 403).

Objection Number 11

"A BID Consortium Meeting Agenda from February 2017 show that the BIDs used the Consortium to address the topic of street vending, as well as Measure H, the LA County Homeless Initiative." (Riskin Decl., Para. 9, 3:13-5).

Grounds for Objection Number 11: Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Lack of personal knowledge; (Evid.C. § 702(a)); Lack of authenticity; (Evid.C. §§ 1400, 1413); Opinion (Evid.C. §§ 800, 803); Foundation ((Evid.C. § 403).

Objection Number 12

"I received this agenda on March 17, 2017, in response to a CPRA request to the East Hollywood BID." (Riskin Decl., Para. 9, 3:15-16.)

Grounds for Objection Number 12: Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Lack

of personal knowledge; (Evid.C. § 702(a)); Lack of authenticity; (Evid.C. §§ 1400, 1413); Hearsay (Evid.C. § 1200); Foundation ((Evid.C. § 403).

Objection Number 13

“Attached as Exhibit F to the Petition for Writ of Mandate are emails from BID Chairman Chatoff which the BID did not provide in response to Request #1 and which show that Chatoff conducted BID business via email.” (Riskin Decl., Para. 10, 3:19-21.)

Grounds for Objection Number 13: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403); Argumentative.

Objection Number 14

“The first email is a March 25, 2017 email from Leddy to Chatoff at which Leddy, from BID email, coordinated Chatoff’s attendance at another BID meeting at which the Skid Row Neighborhood Council election would be discussed.” (Riskin Decl., Para. 10, 3:21-23.)

Grounds for Objection Number 14: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 15

“The second email is an email from Leddy to Chatoff and other recipients regarding the BID’s political organizing in response to the Skid Row Neighborhood Council election.” (Riskin Decl., 3:23-25.)

Grounds for Objection Number 15: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 16

“The third is an additional email from Leddy to Chatoff and other recipients regarding the BID’s political organizing in response to the Skid Row Neighborhood Council election.” (Riskin Decl., Para. 10, 3:25-27.)

Grounds for Objection Number 16: Lack of personal knowledge (Evid.C. § 702(a)); Lack of

1 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
 2 Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403); Argumentative.

3 Objection Number 17

4 “Regarding Request #2, the request for Urban Place Consulting (UPC) emails, Respondent’s
 5 2017 Meeting Calendar, including Respondent’s January 2017 Board Agenda and Packet, show that the
 6 Renewal Committee met twice a month, on the 1st and 4th Thursday of the month.” (Riskin Decl., Para.
 7 11,4:2-5).

8 **Grounds for Objection Number 17:** Lack of personal knowledge (Evid.C. § 702(a)); Lack of
 9 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
 10 Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

11 Objection Number 18

12 “Regarding Request #3, the request for Becker emails related to the BID, the BID never
 13 produced any records in response to this request, including email to Board Member announcing the
 14 August 2017 Board Meeting.” (Riskin Decl., Para. 12, 4:7-9.)

15 **Grounds for Objection Number 18:** Irrelevant (“including email to Board Member announcing the
 16 August 2017 Board Meeting, which was not requested”) (Evid.C. §§ 350, 352).

18 OBJECTIONS TO CISNEROS DECLARATION

19 Objection Number 1

20 “The following articles establish that the activities of Business Improvement Districts generally,
 21 and Respondent in particular, have been the subject of scholarly and journalistic attention, particularly
 22 those BID activities related to political advocacy and municipal lobbying.” (Cisneros Decl., Para. 2,
 23 1:25-27.)

24 **Grounds for Objection Number 1:** Lack of personal knowledge (Evid.C. § 702(a)); Lack of
 25 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
 26 Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

27 Objection Number 2

28 “Attached as Exhibit A is a 2018 Report from the University of California, Berkeley School of

Law Policy Advocacy Clinic prepared for the Westers Regional Advocacy Project titled "Homeless Exclusion Districts: How California Business Improvement Districts Use Policy Advocacy and Policing Practices to Exclude Homeless People from Public Space." (Cisneros Decl., Para. 3, 2:1-4).

Grounds for Objection Number 2: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 3

"That report found that "BIDs advocate at the local and state levels for their policy preferences on a variety of issues that they believe affect property owners ... BIDs seek to enact, maintain, and strengthen laws that criminalize activity like sitting, resting, sleeping, panhandling, and food sharing in public spaces." (Cisneros Decl., Para. 4, 2:7-10.)

Grounds for Objection Number 3: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 4

" At the local level, BIDs often support of anti-homeless ordinances by testifying at city council meetings and in other public forums." (Cisneros Decl., Para. 4, 2:10-12.)

Grounds for Objection Number 4: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 5

"Attached as Exhibit B is a June 21, 2017, article in the LA Weekly titled "Who Killed the Skid Row Neighborhood Council." (Cisneros Decl., Para. 5, 2:13-15.)

Grounds for Objection Number 5: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

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Objection Number 6

"That article discusses the activities of Respondent, in concert with other BIDs, to oppose the formation of the Skid Row Neighborhood Council." (Cisneros Decl., Para. 6, 2:16-17.)

Grounds for Objection Number 6: Lack of personal knowledge; (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant as not the subject of the Petition (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 7

"According to the article, the reporting regarding BID activities was based on records obtained via a California Public Records Act request." (Cisneros Decl., Para. 6, 2:17-19.)

Grounds for Objection Number 7: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 8

"Attached as Exhibit C is a MyNewsLA.com article titled "Requests to clean up LA homeless encampments drowning city resources." (Cisneros Decl., Para. 7, 2:20-21.)

Grounds for Objection Number 8: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 9

"That article reports on a request from the Los Angeles Bureau of Sanitation to the Los Angeles City Council for additional funding." (Cisneros Decl., Para. 8, 2:24-25.)

Grounds for Objection Number 9: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 10

"The article found Respondent's advocacy at the City Council meeting in support of LA newsworthy and the article reports statements of Respondent's Executive Director Leddy." (Cisneros Decl., Para. 8, 2:25-27.)

Grounds for Objection Number 10: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 11

“Attached as Exhibit D is a May 25, 2017, ApparaNews.net article reporting on staff changes at Respondent.” (Cisneros Decl., Para. 9, 3:1-2.)

Grounds for Objection Number 11: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 12

“That article found the BIDs operations newsworthy, quotes Executive Director Leddy, as well as BID Board Members, and reports that Leddy had been delegating more responsibility to Board Members and Organizing Committees on the issues of homeless and street vending.” (Cisneros Decl., Para. 10, 3:5-8.)

Grounds for Objection Number 12: Lack of personal knowledge; (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 13

“According to Financial Statements found on Respondent's website at <http://fashiondistrict.org/wp-content/uploads/2014/02/Fashion-BID-2018-Fin-Strmts-GAAP-FINAL-4-8-19-002.pdf>, Respondent collected over \$4 million in revenue in 2018, the large majority of which came from assessments to parcels of real property which the City of Los Angeles collects and disburses to Respondent.” (Cisneros Decl., Para. 11, 3:9-13.)

Grounds for Objection Number 13: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 14

“According to information on Respondent's website, the BID engages in government advocacy

on topics such as clearing homeless encampments, performs graffiti cleanups, and operates a 24 hour security force. (Cisneros Decl., Para. 15, 3:15-17.)

Grounds for Objection Number 14: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 15

“A roster of BID Board Members from 2016 appears on Respondent’s website; according to that roster, all BID Board Members provided non-BID email addresses as their email contact.” (Cisneros Decl., Para. 13, 3:19-21.)

Grounds for Objection Number 15: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection Number 16

“A true and accurate copy of the Roster from the BID’s website is attached as Exhibit G.” (Cisneros Decl., Para. 13, 3:21-22.)

Grounds for Objection Number 16: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

OBJECTIONS TO RISKIN’S EXHIBITS¹

Objection to Exhibit A

Exhibit A- What purports to be a series of emails (3 pages) unrelated to the BID, with an email from the South Park BID to Ms. Leddy inquiring if the BID is sponsoring a “Women & Safety” seminar, to which Ms. Leddy responds that the BID does not have the money to do so, dated February 2016.

Grounds for Objection to Exhibit A: Lack of personal knowledge (Evid.C. § 702(a)); Lack of

¹ There has been no compliance with Rule 3.110 (c) and (e), California Rules of Court, pertaining to the pagination and identification of Exhibits, and multiple exhibits have been labeled identically.

1 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
2 Foundation (Evid.C. § 403).

3 Objection to Exhibit A

4 Exhibit A- What purports to be two emails, one from Andrew Thomas at the Westwood Village
5 BID to a number of BID Executive Directors regarding a draft "LA BID Salary and Benefits Survey,"
6 and Ms. Leddy's response thereto about adding a category for advanced degrees, dated August 2016.

7 **Grounds for Objection to Exhibit A:** Lack of personal knowledge (Evid.C. § 702(a)); Lack of
8 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
9 Foundation (Evid.C. § 403).

10 Objection to Exhibit A

11 Exhibit A- What purports to be two duplicate copies of an email from the BID to a number of
12 BIDs reminding of a BID Consortium meeting, dated June 2016.

13 **Grounds for Objection to Exhibit A:** Lack of personal knowledge (Evid.C. § 702(a)); Lack of
14 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
15 Foundation (Evid.C. § 403).

16 Objection to Exhibit A

17 Exhibit A- What purports to be an email from the BID to a number of BIDs reminding of a BID
18 Consortium meeting, dated February 2017.

19 **Grounds for Objection to Exhibit A:** Lack of personal knowledge; (Evid.C. § 702(a)); Lack of
20 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
21 Foundation (Evid.C. § 403).

22 Objection to Exhibit B

23 Exhibit B- What purports to be a print out from an unidentified source.
24 **Grounds for Objection to Exhibit B:** Lack of personal knowledge; (Evid.C. § 702(a)); Lack of
25 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
26 Foundation (Evid.C. § 403).

27 Objection to Exhibit B

28 Exhibit B- What purports to be a printout of a meeting agenda for "Los Angeles BID

Consortium” for February 9, 2017, which references that “Legislative/Legal Updates” on Street Vending and Measure H.

Grounds for Objection to Exhibit B: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Foundation (Evid.C. § 403).

Objection to Exhibit C

Exhibit C- What purports to be a “LA Fashion District BID 2017 Meeting Calendar by Month.”

Grounds for Objection to Exhibit C: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Foundation (Evid.C. § 403).

OBJECTION TO CISNEROS’ EXHIBITS

Objection to Exhibit A

Exhibit A- What purports to be a term paper that has nothing to do with and does not reference the Downtown Los Angeles Property Owners Association.

Grounds for Objection to Exhibit A: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection to Exhibit B

Exhibit B- What purports to be newspaper article from the LA Weekly, *which cites Riskin as its source*.

Grounds for Objection to Exhibit B: Lack of personal knowledge (Evid.C. § 702(a)); Lack of authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200); Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

Objection to Exhibit C

Exhibit C- What purports to be a printout from an online source, which also purports to cite Ms. Leddy as supporting resources for housing for the homeless, which is of no relevance here.

Grounds for Objection to Exhibit C: Lack of personal knowledge (Evid.C. § 702(a)); Lack of

1 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
2 Opinion (Evid.C. §§ 800, 803); Foundation (Evid.C. § 403).

3 Objection to Exhibit D

4 Exhibit D- What purports to be a printout from Los Angeles Apparel News, which praises Ms.
5 Leddy.

6 **Grounds for Objection to Exhibit D:** Lack of personal knowledge (Evid.C. § 702(a)); Lack of
7 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
8 Opinion (Evid.C. §§ 800, 803); Foundation.

9
10 **OBJECTION TO VERIFIED PETITION**

11 The "verification" is incomplete and incomprehensible, and therefore, the Petition has not been
12 properly verified, and may not form the basis of the issuance of a writ of mandate. *See* CRC, Rule
13 8.486(a)(4); Cal.Civ.Proc.C. §§ 1069, 1086.

14
15 **OBJECTIONS TO VERIFIED PETITION EXHIBIT**

16 Objection to Exhibit F

17 Exhibit F-What purports to be emails.

18 **Grounds for Objection to Exhibit F:** Lack of personal knowledge (Evid.C. § 702(a)); Lack of
19 authenticity (Evid.C. §§ 1400, 1413); Irrelevant (Evid.C. §§ 350, 352); Hearsay (Evid.C. § 1200);
20 Foundation (Evid.C. § 403).

21
22 Dated: May 28, 2019

BRADLEY & GMEICH LLP

23
24 By: 

25 Barry A. Bradley
26 Carol A. Humiston
27 Attorneys for Respondent, LOS ANGELES
28 PROPERTY OWNERS ASSOCIATION

PROOF OF SERVICE

**Adrian Riskin vs. Downtown Los Angeles Property Owners Association
Case No. BS174792**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 700 North Brand Boulevard, 10th Floor, Glendale, CA 91203-1202.

On May 28, 2019, I served true copies of the following document(s) described as on the interested parties in this action as follows:

Karl Olson, Esq.
Cannata, O'Toole, Fickes & Almazan, LLP
100 Pine Street, Suite 350
San Francisco, CA 94111
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Plaintiff, ADRIAN RISKIN

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Plaintiff, ADRIAN RISKIN

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Bradley & Gmelich LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from e-mail address iaristakesyan@bglawyers.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 28, 2019, at Glendale, California.



Inessa Aristakesyan